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KAY E. BROOKS, PERSONAL REPRESENTATIVE  
OF THE ESTATE OF MARTHA BEOLIA  
JACKSON  
304 Broadway Street  
Frederick, Maryland 21701

NO. 51835 EQUITY  
  
IN THE CIRCUIT COURT

COMPLAINANT

VS.

THE UNKNOWN HEIRS, PERSONAL REPRESENTATIVES,  
DESCENDANTS, AND SUCCESSORS IN INTEREST  
OF GRACE PLUMMER AND ELIZABETH PLUMMER  
DECEASED, LATE OF FREDERICK COUNTY,  
MARYLAND, AND ANY  
AND ALL PERSONS CLAIMING AN INTEREST  
THEREFROM,

FOR FREDERICK

AND

THE UNKNOWN HEIRS, PERSONAL REPRESENTATIVES,  
DESCENDANTS, AND SUCCESSORS IN INTEREST,  
OF NICHOLAS SHIPLEY, TRUSTEE FOR NICHOLAS  
PITTS, LATE OF FREDERICK COUNTY,  
MARYLAND, AND ANY AND ALL PERSONS CLAIMING  
AN INTEREST THEREFROM

AND

ANY AND ALL PERSONS CLAIMING ANY INTEREST  
IN A PARCEL OF REAL PROPERTY SITUATE  
IN THE TOWN OF NEW MARKET, MARYLAND,  
AND DESCRIBED AS LOT 20, ON A PLAT  
OF SAID TOWN

COUNTY, MARYLAND

RESPONDENTS

\* \* \* \* \*

BILL OF COMPLAINT

Now comes Kay E. Brooks, Personal Representative of the Estate of  
Martha Beolia Jackson, late of Frederick County, Maryland, by her attorneys, Seymour B.  
Stern and Lawrence E. Finegan and respectfully represents unto this Honorable Court as  
follows:

1. That on or about the 31st day of May, 1979, Martha Beolia Jackson, a  
resident of Frederick County, Maryland, died testate. Pursuant to a nomination